

LAW OFFICE OF KEVIN J. KEATING, P.C.

Kevin J. Keating
Attorney at Law

666 Old Country Road, Suite 900
Garden City, New York 11530
kevin@kevinkeatinglaw.com
T: 516-222-1099

Counsel:
Stefani Goldin, Esq.

Manhattan Office
(BY APPOINTMENT)
T: 212- 964-2702

April 23, 2020

VIA ECF

Honorable Joseph F. Bianco
United States Court of Appeals for the Second Circuit
40 Foley Square
New York, New York 10007

Re: United States of America v. Michael Ashley
11 CR 0516 (JFB)

Dear Judge Bianco:

As you are aware, I am attorney for Michael Ashley, who was sentenced by Your Honor on July 17th, 2019, to a 36 month term of imprisonment. Mr. Ashley is scheduled to surrender to begin serving his sentence on July 16, 2020. I write, with the consent of the Government, to respectfully request a 120 day extension of Ashley's surrender date to November 16, 2020.

As the Court may recall, Ashley operates RebuildNy.com D/B/A Realty Warehouse, a real estate services company located at 201 Old Country Road, Melville, New York. The company has 50 salaried employees on location and provides an array of real estate services to its many clients. The COVID-19 pandemic has shuttered the business operations of Realty Warehouse. While the employees are currently collecting unemployment insurance, the company is maintaining its leased office space in Melville and plans to resume business operations when legally permitted and feasible. It is upon this basis that we seek this extension of the surrender date, as this period should enable the company to reopen and stabilize, and for its employees to return to work.

As noted, I have conferred with AUSA Martin Coffey, who offers his consent to this application.

Thank you for your consideration.

Very truly yours,

/s/ Kevin J. Keating
KEVIN J. KEATING, ESQ.

KJK:sep
cc: AUSA Martin Coffey
Clerk of the Court

Request granted.

SO ORDERED:

4-25-20

s/Joseph F Bianco

U.S. Circuit Judge (acting by designation)